

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

Robert W. Johnson Plaintiff(s)  
vs.  
Quality Inn & Suites Downtown & Defendant(s)  
Choice Hotels.

Civil Case No.: 5:22-cv-512(DNH/ATB)

COMPLAINT FOR  
EMPLOYMENT  
DISCRIMINATION  
BASED UPON AGE

Plaintiff(s) demand(s) a trial by:  JURY  COURT (Select only one) **FILED**

Plaintiff(s) in the above-captioned action, allege(s) as follows:

MAY 17 2022

## JURISDICTION

AT        O'CLOCK  
John M. Domurad, Clerk Syracuse

1. Jurisdiction is conferred on this court pursuant to 29 U.S.C. §§ 626(c)(1). If the plaintiff is a federal employee, jurisdiction is conferred on this court pursuant to 29 U.S.C. § 633a(c).

## PARTIES

2. a. Plaintiff: Robert W. Johnson  
Address: 112 Court St. APT 2  
Watertown, NY 13601

b. Plaintiff: \_\_\_\_\_  
Address: \_\_\_\_\_  
\_\_\_\_\_

Additional Plaintiffs may be added on a separate sheet of paper.

3. a. Defendant:

Official Position:

Address:

Quality Inn & Suites Downtown  
Corporation

b. Defendant:

Official Position:

Address:

Choice Hotels  
Corporation

Additional Defendants may be added on a separate sheet of paper.

4. This action is brought pursuant to the Age Discrimination in Employment Act of 1967, 29 U.S.C. §§ 621-634(b), as amended, for employment discrimination based on age.
5. Venue is invoked pursuant to 28 U.S.C. § 1391.
6. The conduct complained of in this action involves:

(A)  Failure to employ

(B)  Termination of employment

(C)  Failure to promote

(D)  Unequal terms and conditions of employment

(E)  Reduction in wages

(F)  Retaliation

(G)  Other acts as specified below:

## FACTS

7. Set forth the facts of your case which substantiate your claim of discrimination. List the events in the order they happened, naming defendants involved, dates and places.

**Note:** Each fact should be stated in a separate paragraph; paragraphs should be numbered sequentially.

You must include allegations of wrongful conduct as to EACH and EVERY defendant in your complaint.

The facts surrounding my claim of discrimination are:

I was discriminated against and denied employment for no valid reasons given and no policy information was provided on criteria's for employment.

8. (a) My date of birth is: 1984.  
(b) My age at the time of the alleged discriminatory act was: 38.

9. I filed charges with the New York State Division on Human Rights or the New York City Commission on Human Rights regarding the alleged discriminatory acts on or about:

Pending, 20  
(Date)

10. I filed a Notice of Intent with the Equal Employment Opportunity Commission on or about:

Pending, 20  
(Date)

11. The Equal Employment Opportunity Commission issued a Notice-of-Right-to-Sue letter (copy attached) which was received by me on or about:

Pending \_\_\_\_\_, 20  
(Date)

12. The plaintiff is an employee within the meaning of 29 U.S.C. § 630(f).

13. The plaintiff is within the age limits as prescribed by 29 U.S.C. § 631(a).

14. The defendant(s) is (are) an employer, employment agency, or labor organization within the meaning of 29 U.S.C. § 630(b) (c) and (d).

15. The defendant(s) is (are) engaged in commerce within the meaning of 29 U.S.C. § 630(h).

16. In accordance with 29 U.S.C. § 626(d) and § 633(b), more than sixty (60) days have elapsed since filing a charge alleging unlawful discrimination with the New York State Division of Human Rights, the New York City Commission on Human Rights or the Equal Employment Opportunity Commission.

17. If plaintiff is a federal employee and has not filed a complaint with the Equal Employment Opportunity Commission, in accordance with 29 U.S.C. § 633a(d) a thirty (30) day Notice of Intent to File this action must be given to the Equal Employment Opportunity Commission before an action may be brought in this Court.

18. **PRAYER FOR RELIEF**

WHEREFORE, plaintiff(s) request(s) that this Court grant the following relief:

\$100,000,000.00 for punitive damages;  
Employment: All other reliefs just &  
proper.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: 05/17/2022

Robert W. Johnson  
Signature of Plaintiff(s)  
(all Plaintiffs must sign)